

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**  
Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF AD HOC COMMITTEE OF SUPPORTING COUNSEL'S  
MOTION TO SUPPLEMENT RECORD ON APPEAL**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**PLEASE TAKE NOTICE** that the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”), by and through its counsel, will move, on an expedited basis, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), 402 East State Street, Trenton, New Jersey 08608, pursuant to Fed. R. Bankr. P. 8009(e)(2)(B) (the “Motion”) for entry of an Order supplementing the record on appeal to include the Additional Documents<sup>2</sup> in connection with the AHC of Supporting Counsel’s appeal from the Bankruptcy Court’s *Memorandum Opinion* [Docket No. 1127] and the related *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures with Respect to Requests for Compensation; and (III) Granting Related Relief* [Docket No. 1211].

**PLEASE TAKE FURTHER NOTICE** that the Motion sets forth the relevant factual bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that, substantially contemporaneously with the filing of this Motion, the AHC of Supporting Counsel has filed an *Application for Order Shortening Time and Certain Other Relief* (the “Application”) requesting that the hearing on the Motion be scheduled for November 15, 2023.

**PLEASE TAKE FURTHER NOTICE** that the order entered with respect to the Application will, among other things, specify the date and time of the hearing on the Motion.

**PLEASE TAKE FURTHER NOTICE** that all objections, if any, must be made accordance with the Court’s order entered with respect to the Application. If the order entered with respect to the Application directs that written objections be filed, then in accordance with D.N.J.

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon (a) the Debtor's counsel, (b) counsel to the Official Committee of Talc Claimants, (c) the legal representative for future talc claimants and her counsel, (d) counsel to the Ad Hoc Committee of Supporting Counsel, (e) the Office of the United States Trustee for the District of New Jersey and (f) the other parties on the Master Service List established by the Case Management Order so they are received by the deadline set forth in the Court's order entered with respect to the Application.

**PLEASE TAKE FURTHER NOTICE** that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion as requested by the AHC of Supporting Counsel.

**PLEASE TAKE FURTHER NOTICE** that unless responses are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Dated: October 27, 2023

**COLE SCHOTZ P.C.**

/s/ Michael D. Sirota

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